

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057 (MDC)

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
"BOB" MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S), JANE DOE(S),
DELAWARE and OTHER LAW FIRMS
representing and acting in concert with John
Doe(s) and/or Jane Doe(s), INVESTMENT
BANKS employed by John Doe(s) and/or Jane
Doe(s), PATRIC THEUNE, and SEECUBIC
B.V.,

Defendants.

**NOTICE OF UPDATE IN RESPONSE TO THE COURT'S REQUEST FOR
EVIDENTIARY HEARING REGARDING DEBTOR'S**

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**MOTION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION
AND PERMANENT INJUNCTION**

PLEASE TAKE NOTICE that on October 3, 2023, the Court entered a Scheduling Order and set a hearing for Friday, October 6, 2023. (D.I. 33) The Court requested information to allow the court to determine whether a live hearing was necessary or remote hearing would be possible.

PLEASE TAKE FURTHER NOTICE that the parties have been conferring and it appears that they will require hearing in person to accommodate live testimony and cross examination.

PLEASE TAKE FURTHER NOTICE that the parties are still conferring in an attempt to potentially agree on certain stipulated facts. Debtors requested an extension of the deadline to 12:00 pm (EST) today, through a call to Chambers, in order to attempt to reach an agreement at least in regard to some stipulated facts in order to maximize the Court's time.

PLEASE TAKE FURTHER NOTICE that at this time, the Debtors have identified Mr. Robertson and Mr. Rajan as witnesses and their Declarations (D.I. 30) as the documents including the exhibits, upon which they intend to rely for the hearing on October 6. Rembrandt has identified Mr. Michaels as a potential witness and forwarded a list of potentially stipulated facts to which the parties have not yet been able to review and discuss. Other parties have not yet identified their witnesses or their documents. The Debtors are hopeful that the parties file a stipulation today in order to facilitate the Friday hearing. The Debtors reserve all rights to include further witnesses as the parties have not all identified their witnesses, either in rebuttal or in their case in chief.

Dated: October 4, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin-Aravena
Rafael X. Zahralddin-Aravena (PA Bar No.
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(pro hac to be filed)

Counsel to the Debtors